FILED **ENTERED** LODGED RECEIVED 1 THE HONRORABLE JUDGE TANA LIN MAR 2 8 2024 KS 2 AT SEATTLE CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHING 3 DEPUTY 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 CORNER COMPUTING SOLUTIONS NO. 2:23-cv-00-3-TL 10 PLAINTIFF, 11 FIRST AMENDED COMPLAINT FOR 12 **DAMAGES** 13 **BREACH OF CONTRACT VIA** ٧. 14 **BREACH OF COVENANT OF** 15 GOOD FAITH AND FAIR DEALING 16 GOOGLE LLC, 17 DEFENDANT. 18 19 1. PARTIES TO THIS COMPLAINT A. Plaintiff: Dale Jake Corner Pro Se 20 21 Corner Computing Solutions 22823 14nth pl west Bothell WA 98021 22 23 1 206 853 5207 24 25 B. Defendant: Google LLC-1600 Amphitheatre Parkway Mountain View, CA 94043 26 27 777 6th St South Building A, Kirkland, WA 98033 28 29 30 2. STATEMENT AND CLAIMS FOR RELIEF AND COMPENSATION 31 1. Google LLC, has breached contract by not acting within "The Covenant Of Good Faith And Fair Dealing". By refusing to remove spurious "Fake Engagement" and or 32 33 "Misrepresentation" reviews per their own policy for 5 or more months is a breach of the contractual obligations of The Implied Covenant Of Good Faith And Fair Dealing; 34 35 causing damages to the good name of my business. This breach of "The Covenant

Good Faith And Fair Dealing" is created by Google LLC's negligence in the inappropriate handling of the Google AdWords/Google Ads account "Corner Computing Solutions"; via refusing to remove the "Prohibited and Restricted Content" via their own policies in a fair and timely manner. My complaint and claim is that Google LLC did not act in good faith and did not deal fairly with my account or reviews left on it, nor in the administration of the contract and Goolge LLC's own policies. This via outright ignoring communication requests, requests for clarification, as well as ignoring the escalation requests via their own online forms; and specifically not obeying their own policies regarding the content. By that conduct they have acted in a way that undermines good faith and fair dealing with the contract; and the policies which have to be agreed to that act as a contractual obligation for both parties to obey, and act upon with good faith and deal fairly with. This contract was entered into by Google LLC and Corner Computing Solutions at the creation of the Google AdWords and business account for "Corner Computing Solutions." The contract and policies as mentioned are "Google Terms Of Service" and "Google LLC Maps User Generated Content Policy" also referenced as "Contribution Policy" via the link to the policy "https://support.google.com/business/answer/4596773?hl=en&co=GENIE.Platform%3 DAndroid & https://support.google.com/contributionpolicy/answer/7400114?hl=en"

Specifics: "Google LLC Maps User Generated Content Policy", section "Prohibited &

restricted content", each section, subsection and subordinate section named and identified

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58	specific as it is to reviews breaching said policy. Reviews in question are 1 star. Each review
59	breaches not only "Fake Engagement" but multiple sections of that policy. Specifically all 1 Star
60	reviews left on the Corner Computing Solutions account are in breach of the "Prohibited &
61	restricted content" policy.
62	Those sections of "Google LLC Maps User Generated Content Policy" are:
63	Main Document Section 1: "Prohibited & Restricted Content"
64	Sub section of Section 1: 1.1 "Deceptive content & behavior"
65	Subordinate Section of Subsection 1.1: A: "Fake engagement"
66	Specific Section of Subordinate Section 1.1:A: A-3: "Content that is not based on a real
67	experience and does not accurately represent the location or product in question."
68	Specific Section of Subordinate Section 1.1:A: A-6: "Content that has been posted from multiple
69	accounts to manipulate a place's rating."
70	Subordinate Section of Subsection 1.1:D: "Misrepresentation"
71	Specific Section of Subordinate Section 1.1:D:A-1: "False or misleading accounts of the
72	description or quality of good or service." Google LLC Governing Statement: "Misleading
73	information can impact the quality of information on Google Maps. For this reason, we don't
74	allow individuals to use Google Maps to mislead or deceive others, or make
75	misrepresentations."
76	Specific Section of Subordinate Section 1.1:D:A-3: "Distorting or omitting information that Could
77	have an undue impact on user decision making."
78	Sub section of Section: 1:1.2 "Inappropriate content & behavior"
79	Subordinate Section of Sub Section: 1:1.2: A: "Offensive Content"

80	Specific Section Of Subordinate Section 1:1.2: A-2: "Content that is clearly and deliberately
81	provocative."
82	Specific Section Of Subordinate Section 1:1.2: A-3: "Unsubstantiated allegations of unethical
83	behavior or criminal wrong doing." Google's governing statement: "Google Maps should be a
84	place of respect—even in disagreement—among users. For that reason, we don't allow users to
85	post offensive content".
86	Sub Section of Section: 1:1.2: N "Off-topic"
87	Specific Section of Subordinate Section 1:1.2-N: "Only post content that is based on your
88	experience or questions about experiences at a specific location. We don't allow content which
89	contains general, political, or social commentary or personal rants."
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91	Accounts and reviews breaching the "Google LLC Maps User Generated Content Policy"
92	(current to this First amended complaint see also exhibits, responses and other papers
93	submitted to the court)
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95	User name: Mr. Murdock
96	Link: https://www.google.com/maps/contrib/103246800720866973069?hl=en-
97	US&ved=1t:31294&ictx=111
98	Section breach: Specific Section of Subordinate Section 1.1:A: A-3
99	Specific Section of Subordinate Section 1:1.2: A-2
100	Specific Section of Subordinate Section 1:1.2: A-3
101	Specific Section of Subordinate Section 1.1:D:A-1
102	Specific Section of Subordinate Section 1.1:D:A-3

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104	
105	<u>User name: Mike Huntleton</u>
106	Link: https://www.google.com/maps/contrib/111433697992048191737?hl=en-
107	US&ved=1t:31294&ictx=111
108	Section breach: Specific Section of Subordinate Section 1.1:A: A-3
109	Specific Section of Subordinate Section 1:1.2: A-2
110	Specific Section of Subordinate Section 1:1.2: A-3
111	Specific Section of Subordinate Section 1.1:D:A-1
112	Specific Section of Subordinate Section 1.1:D:A-3
113	
114	User name: Joe Swanson
115	Link: https://www.google.com/maps/contrib/109446053631752887858?hl=en-
116	<u>US&ved=1t:31294&ictx=111</u>
117	Section breach: Specific Section of Subordinate Section 1.1:A: A-3
118	Specific Section of Subordinate Section 1:1.2: A-2
119	Specific Section of Subordinate Section 1:1.2: A-3
1.20	Specific Section of Subordinate Section 1.1:D:A-1
121	Specific Section of Subordinate Section 1.1:D: A-3
122	
123	<u>User name: TNG Gaming Live</u>
124	Link: https://www.google.com/maps/contrib/118117381480880423007?hl=en-
125	<u>US&ved=1t:31294&ictx=111</u>

126	Section breach: Specific Section of Subordinate Section 1.1:A: A-3
127	Specific Section of Subordinate Section 1:1.2: A-2
128	Specific Section of Subordinate Section 1:1.2: A-3
129	Specific Section of Subordinate Section 1.1:D: A-1
130	Specific Section of Subordinate Section 1.1:D: A-3
131	
132	<u>User name: Somebody</u>
133	Link: https://www.google.com/maps/contrib/101202610839271484556?hl=en-
134	<u>US&ved=1t:31294&ictx=111</u>
135	Section breach: Specific Section of Subordinate Section 1.1:A: A-3
136	Specific Section of Subordinate Section 1:1.2: A-2
137	Specific Section of Subordinate Section 1:1.2: A-3
138	Specific Section of Subordinate Section 1.1:D: A-1
139	Specific Section of Subordinate Section 1.1:D: A-3
140	
141	User name: Itz F8Hyper
142	Link: https://www.google.com/maps/contrib/100607415484070640912?hl=en-
143	US&ved=1t:31294&ictx=111
144	Section breach: Specific Section of Subordinate Section 1.1:A: A-3
145	Specific Section of Subordinate Section 1:1.2: A-2
146	Specific Section of Subordinate Section 1:1.2: A-3
147	Specific Section of Subordinate Section 1.1:D: A-1
148	Specific Section of Subordinate Section 1.1:D: A-3

149	
150	<u>Username: Chris Hansen</u>
151	Link: https://www.google.com/maps/contrib/111961291105641329261?hl=en-
152	<u>US&ved=1t:31294&ictx=111</u>
153	Section breach: Specific Section of Subordinate Section 1.1:A: A-3
154	Specific Section of Subordinate Section 1:1.2: A-2
155	Specific Section of Subordinate Section 1:1.2: A-3
156	Specific Section of Subordinate Section 1.1:D: A-1
157	Specific Section of Subordinate Section 1.1:D: A-3
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159	User name: Markiemm S
160	Link: https://www.google.com/maps/contrib/106423851647970529462?hl=en-
161	<u>US&ved=1t:31294&ictx=111</u>
162	Section breach: Specific Section of Subordinate Section 1.1:A: A-3
163	Specific Section of Subordinate Section 1:1.2: A-2
164	Specific Section of Subordinate Section 1:1.2: A-3
165	Specific Section of Subordinate Section 1.1:D: A-1
166	Specific Section of Subordinate Section 1.1:D: A-3
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168	User name: Unknown?
169	Link: https://www.google.com/maps/contrib/106381866268171308319?hl=en-
170	<u>US&ved=1t:31294&ictx=111</u>
171	Section breach: Specific Section of Subordinate Section 1.1:A: A-3

172 Specific Section of Subordinate Section 1:1.2: A-2 Specific Section of Subordinate Section 1:1.2: A-3 173 174 Specific Section of Subordinate Section 1.1:D: A-1 175 Specific Section of Subordinate Section 1.1:D: A-3 176 177 User name: Matt Link: https://www.google.com/maps/contrib/101784716086259317128?hl=en-178 179 US&ved=1t:31294&ictx=111 180 Section breach: Specific Section of Subordinate Section 1.1:A: A-3 181 Supporting: See Exhibit A: Page 1 through 19 182 Supporting: SEE SECTION 2: STATEMENT AND CLAIMS FOR RELIEF 1, 2 and 3 183 184 2. The spurious origin and "Prohibited and Restricted Content" reviews have also 185 caused damage to my personal good name via the lowering of my company's rating. 186 Which in turn lowers the trust of prospective customers in not only my company but 187 myself the plaintiff as well. Google LLC could have fairly removed these "Prohibited and Restricted Content" reviews via their own policy; dealt fairly and in good faith with 188 "Corner Computing Solutions" and has chosen not to; despite those reviews meeting 189 190 the guidelines for removal per their own policy; a policy that is part of the contractual 191 obligations of both parties. This breach of "The Covenant Good Faith And Fair Dealing" 192 is due directly to negligence or otherwise inappropriate action by Google LLC not acting 193 in a fair and timely manner.; resulting in another breach of contract on those grounds.

194 Supporting: See Exhibit A: Page 1 Through 19

Supporting: See Exhibit B: Page 1 Through 7

Supporting: See Statement and Claims For Relief and Compensation 1.

3. Google LLC for 5 or more months has refused to remove the "Prohibited and Restricted Content" reviews, been notified of the situation via their own forms and contact procedures and has been given ample time to fix the issue. Google LLC has unfairly refused to do so in a fair and timely manner and refused to act in good faith and deal fairly regarding their own policies. This results in multiple breaches of contract via breaching of "The Covenant Of Good Faith And Fair Dealing" to such an extent that by inaction, or inappropriate action Google LLC has caused undue harm.

Supporting: SEE SECTION 2: STATEMENT AND CLAIMS FOR RELIEF 1

Supporting: See Exhibit A: Pages 14 and 15

Supporting: See Exhibit B: Pages 1 Through 7

4. Google LLC for 5 or more months banned my Virus Total account without pre notification or communication. The "DALEJAKECORNER" account represents three years of hard work and data gathering, the data and opinions are live and real, and this has also caused destruction of evidence held in the comments of the account. That evidence and work appears to be unrecoverable. Despite many contacts about the issue Google LLC refuses to ban the acting spurious "Troll" accounts on "Virus Total" leaving spurious comments; and yet has banned my account instead; again not acting in "The

Covenant Of Good Faith And Fair Dealing" resulting in a third breach of contract on those grounds.

Supporting: SEE SECTION 2: STATEMENT AND CLAIMS FOR RELIEF 1

Supporting: See Exhibit C: Pages 1 Through 6

3. REQUST FOR RELIEF AND COMPENSATION

On the afore mentioned grounds, Corner Computing Solutions is requesting relief and compensation to the amount of 150 Million United States Dollars. This due to Google LLC's breach of contract via breach of "The Covenant Of Good Faith And Fair Dealing" which has created undue hardship, unrecoverable work, psychological strain, loss of business and revenue, unrecoverable damage to my good name and that of my business. This situation is ongoing as of the submission of this case. I am also requesting compensation for time, effort, legal fees and costs if any as it pertains to the filing of this complaint. Furthermore I am requesting that all 1 star reviews on "Corner Computing Solutions" be removed. That the "DALEJAKECORNER" Virus Total account be reinstated along with the comments contained and the offending "Trolls" banned per policy. The amount requested is also to create good reason for Google LLC and other companies engaged in the same kind of business incentive to not conduct the same negative activity again or in the future. The monetary damages are within the scope of recent fines and sanctions levied against Google LLC.

4. CERTIFICATION AND CLOSING

I certify to the best of my knowledge, information, and belief that this complaint:

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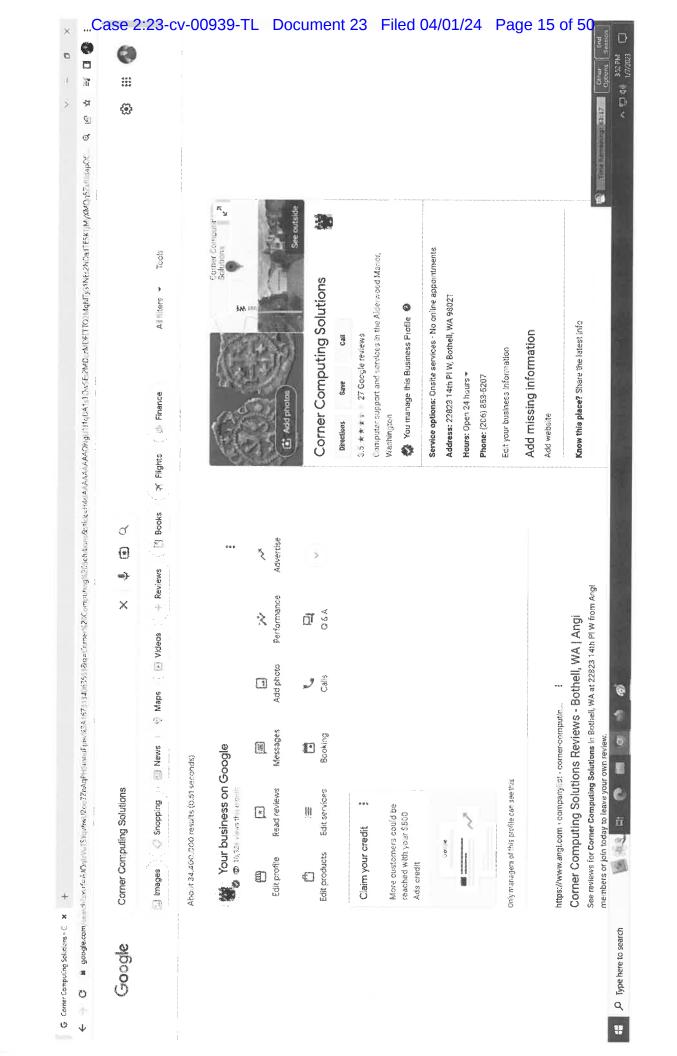
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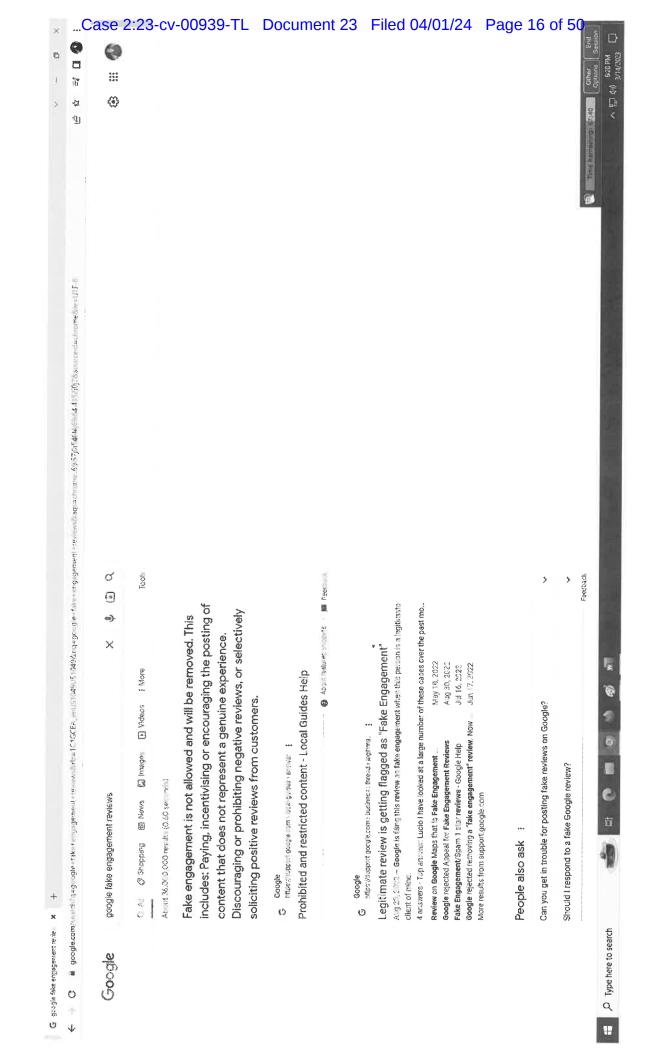
237	(1) is not being presented for an improper purpose, such as to harass, cause
238	unnecessary delay, or needlessly increase the cost of litigation;
239	(2) is supported by existing law or by a nonfrivolous argument.
240	(3) the factual contentions have evidentiary support or, if specifically so
241	identified, will likely have evidentiary support after a reasonable opportunity for further
242	investigation or discovery; and
243	(4) the complaint otherwise complies with the requirements of Rule 11.
244	I agree to provide the Clerk's Office with any changes to my address where case-related
245	papers may be served. I understand that my failure to keep a current address on file
246	with the Clerk's Office may result in the dismissal of my case.
247	
248	Date of signing: MANCH 28 2024 2:31 PM PSF
249	Place of signing: Jours district court sintle
250	Signature of Plaintiff: Sur Jamon
251	Printed Name of Plaintiff: Dale & Corner
252	WORD COUNT: 1,953 words

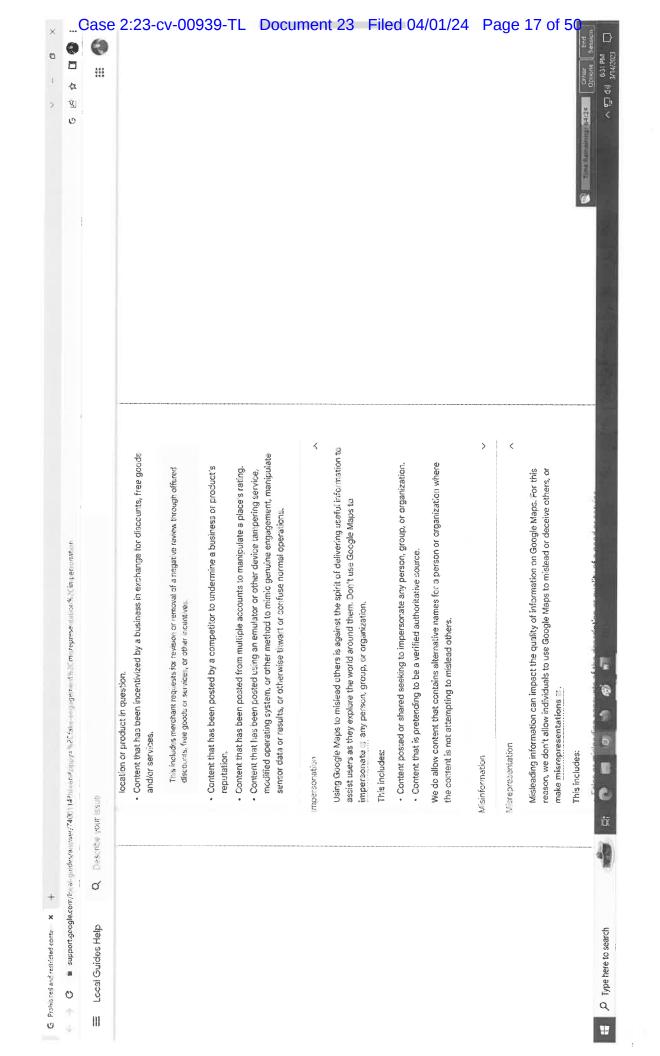
1 THE HONRORABLE JUDGE TANA LIN 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 CORNER COMPUTING SOLUTIONS NO. 2:23-cv-00-3- TL 10 PLAINTIFF, 11 PLAINTIFF'S FIRST MOTION TO AMEND 12 COMPLAINT V. 13 14 15 GOOGLE LLC, DEFENDANT. 16 17 18 PARTIES TO THIS MOTION TO AMEND COMPLAINT 19 A. Plaintiff: Dale Jake Corner Pro Se 20 Corner Computing Solutions 22823 14nth pl west Bothell WA 98021 21 22 1 206 853 5207 23 24 B. Defendant: 25 Google LLC 1600 Amphitheatre Parkway Mountain View, CA 94043 26 27 The Complaint Plaintiff Corner Computing Solutions self-represented by Dale Jake Corner Pro Se, 28 submits this motion and moves the court with respect to accept this first motion to Amend the complaint for case number: 2:23-cv-00-3- TL. The first Amended Complaint (FAC) is attached. The 29 motion is to allow in full the changes to verbiage including more direct communication as to the claim 30 31 and portions of the claim for clarification to the court, defendant and Council of record. Also contained 32 in the First Amended Complaint a list of the accounts and reviews in question that still exist on the 33 account, including links to each account to grant further clarification to the Defendant. Further contained is clarification of the contract and policies involved in the complaint. A change to the address 34 35 for service and Defendant location is contained as well. No other changes at this time appear necessary.

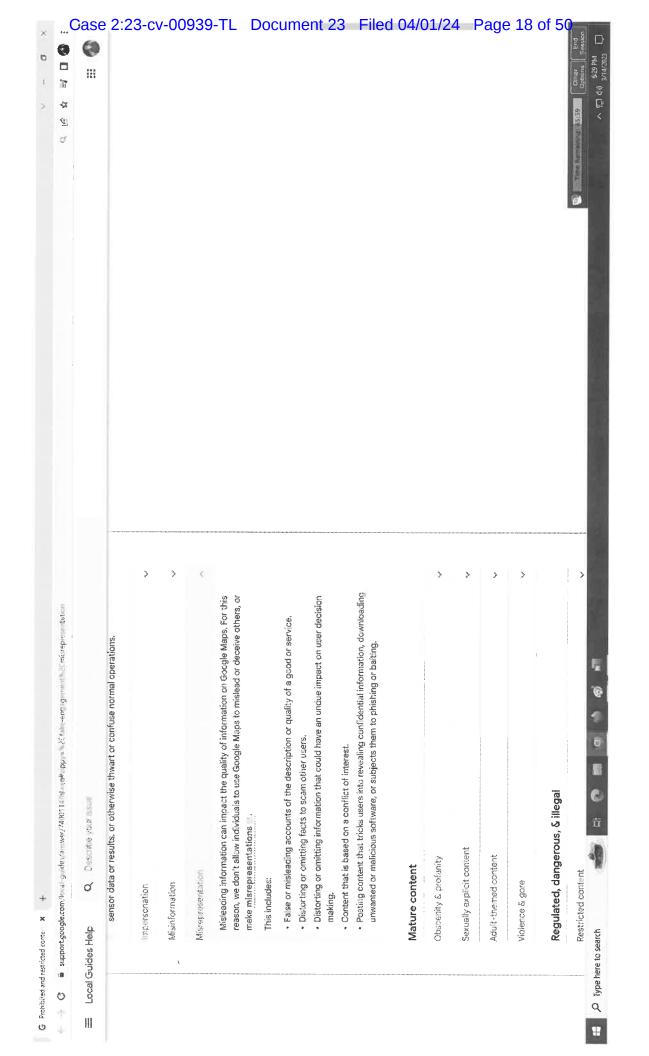
36 CERTIFICATION I, Dale Jake Corner, Sole Proprietor of CORNER COMPUTING SOLUTIONS and plaintiff as Pro Se in Case 37 Number 2:23-cv-00930 do here by certify under penalty of perjury that the forgoing statement is true 38 and correct and submitted by myself. 39 40 RESPECTFULLY SUBMITTED THIS DATE&TIME: 41 Name: DALE JAKE CORNER Pro Se 42 Signed: Address:22823 14nth pl west Bothell Wa 98021 Phone: 1 206 853 5207 43 WORD COUNT: 288 WORDS SUM TOTAL ABOVE 44

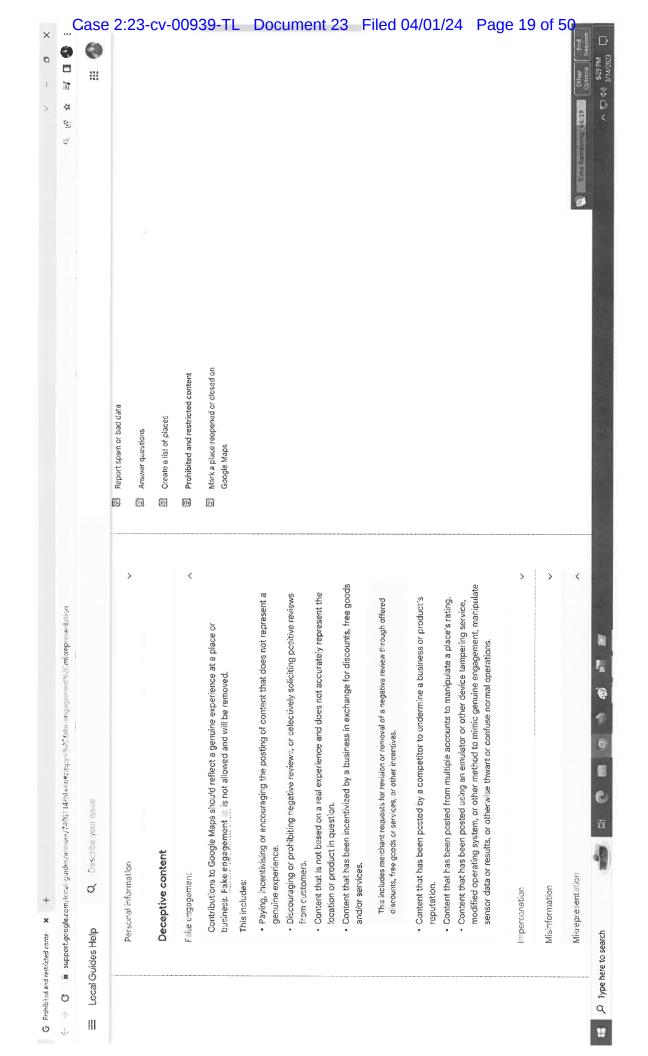
EXHIBIT A

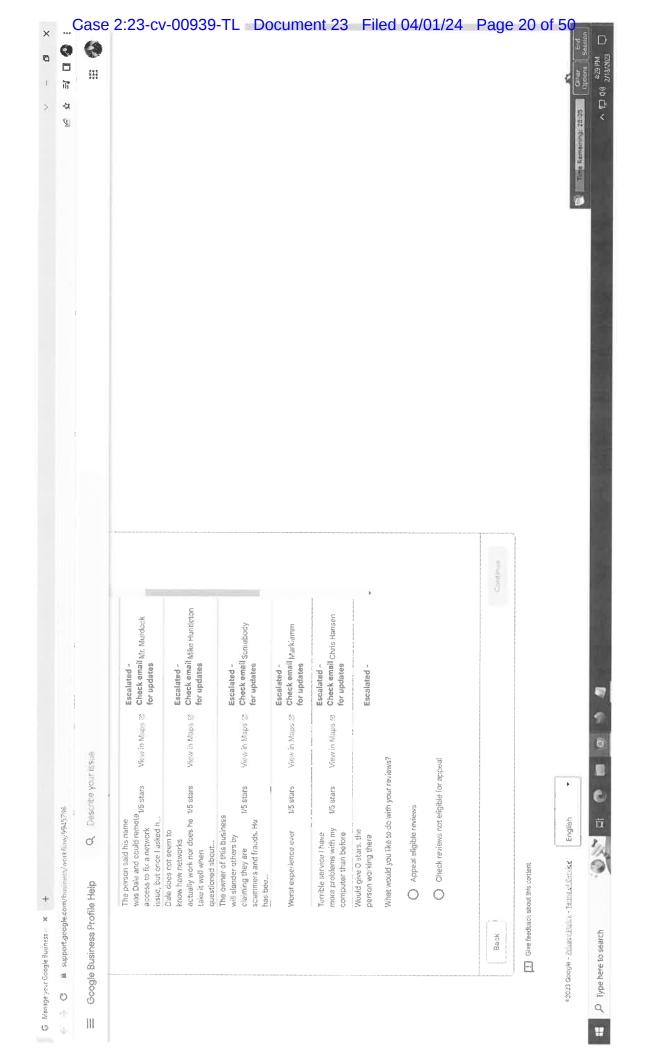


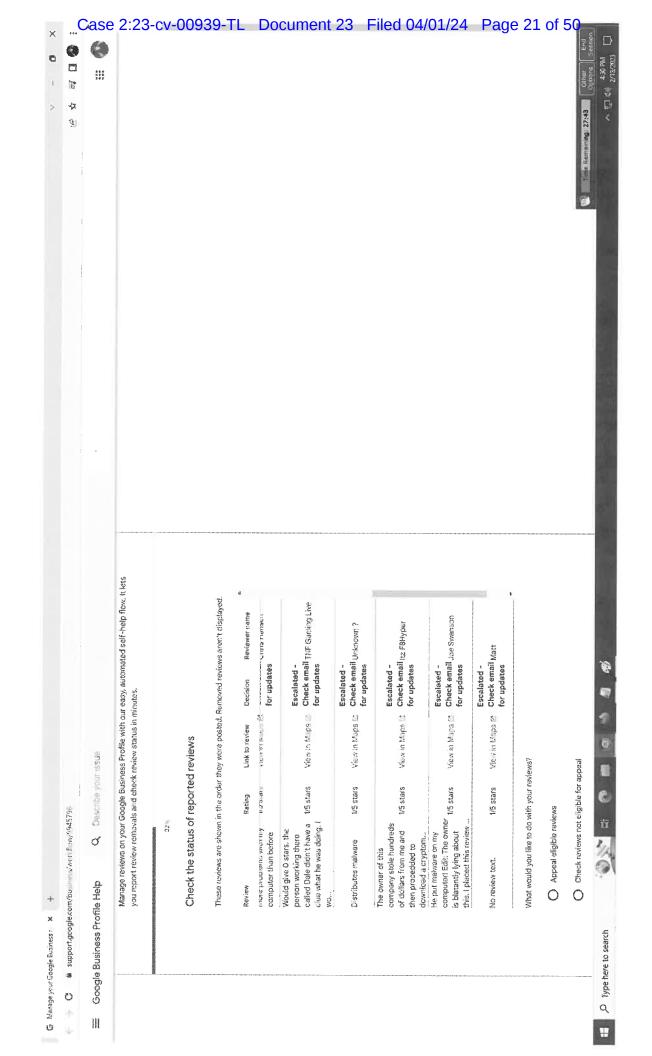


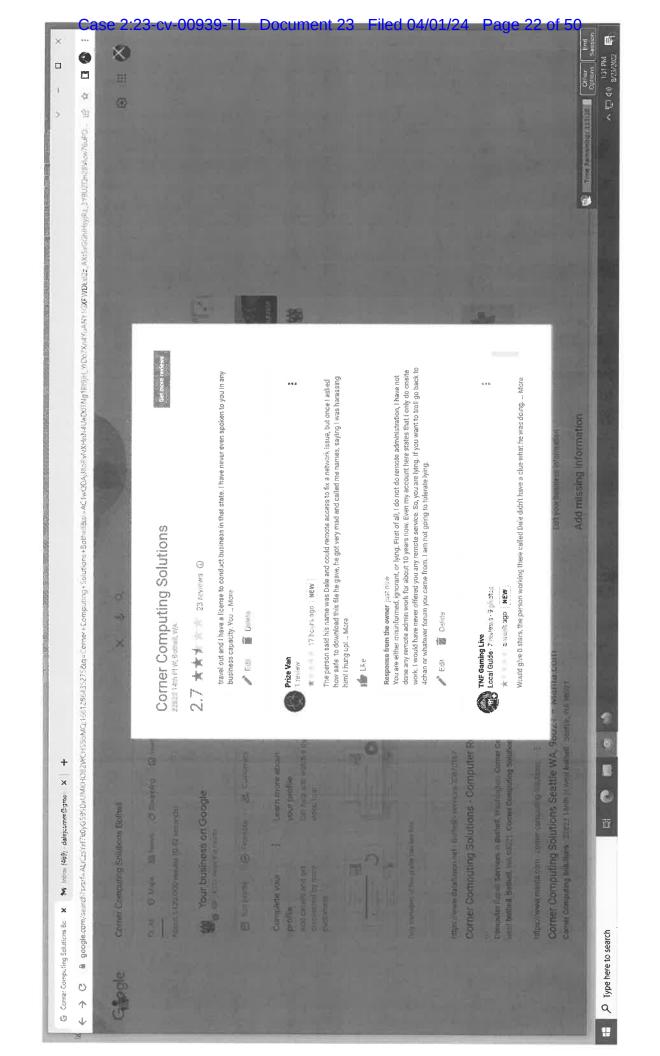


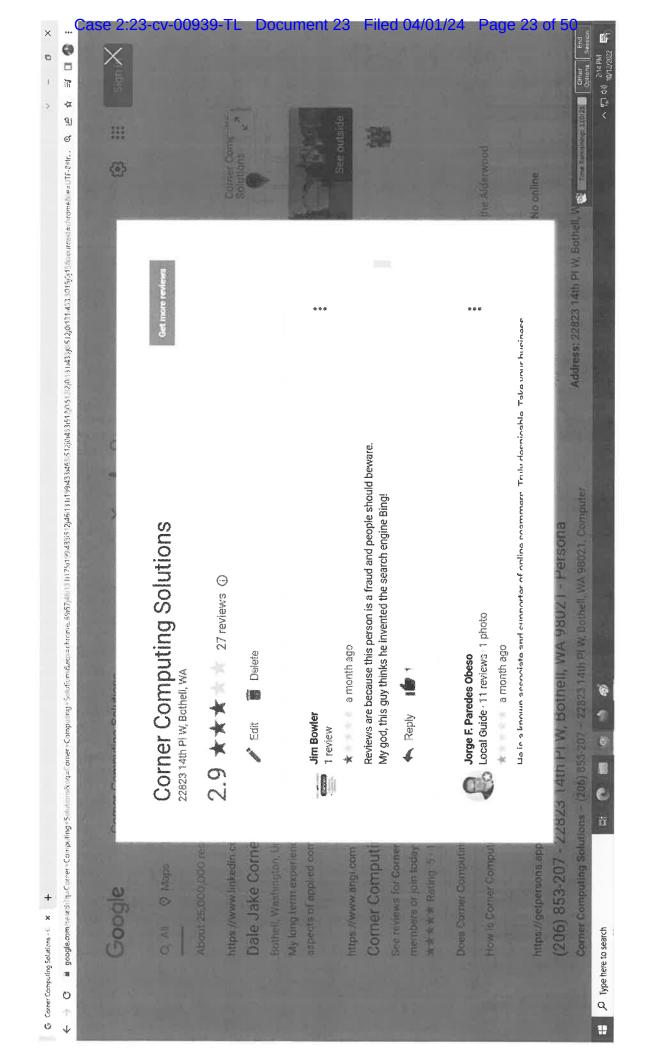


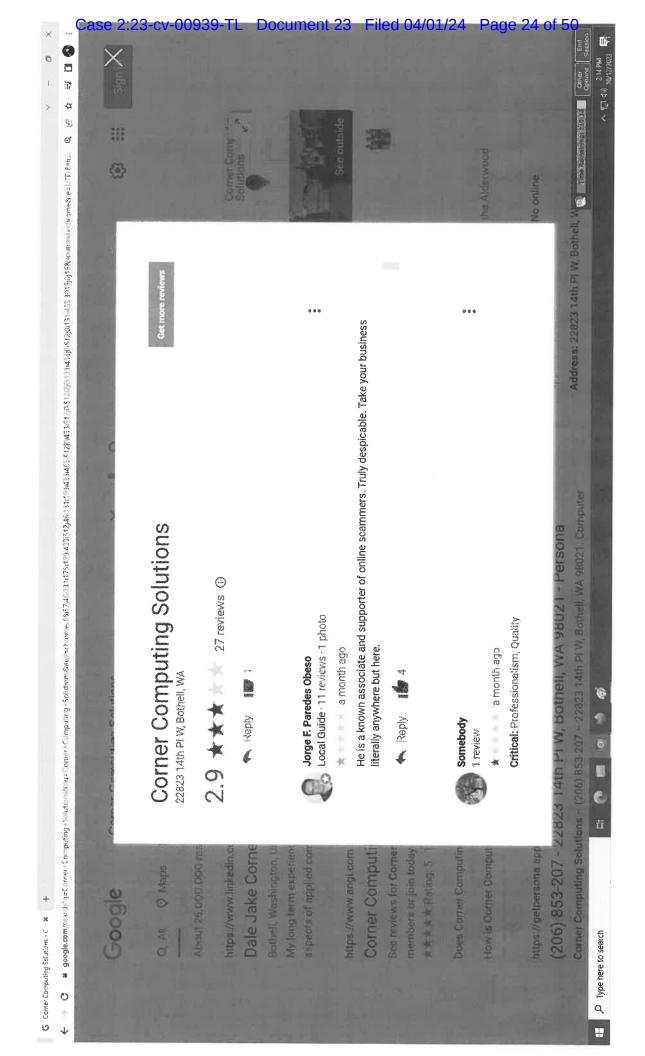


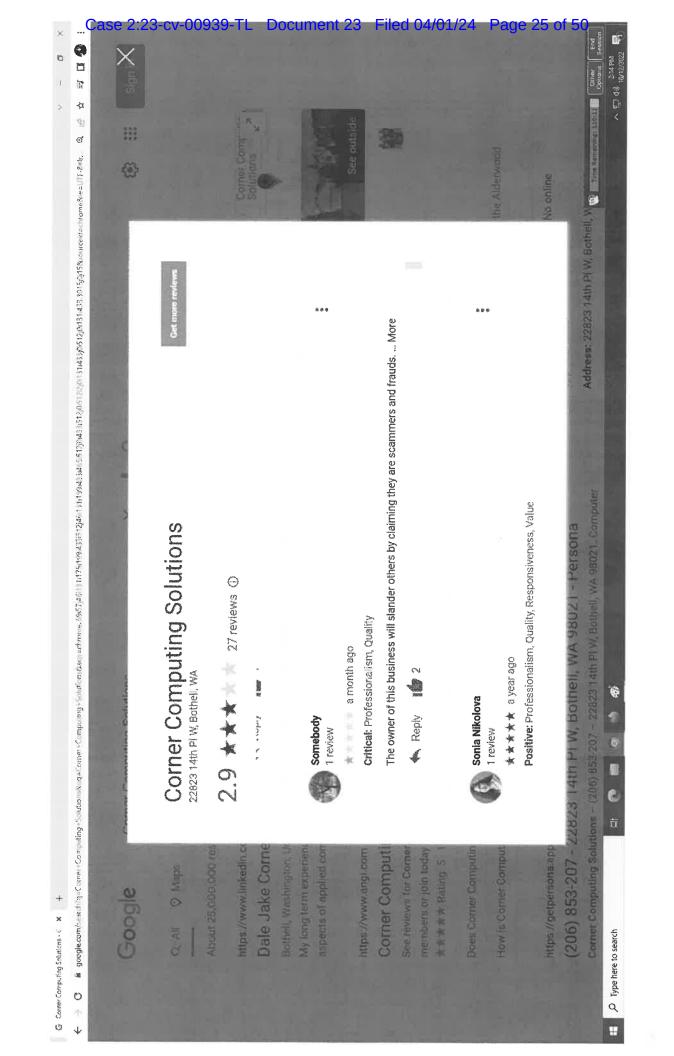


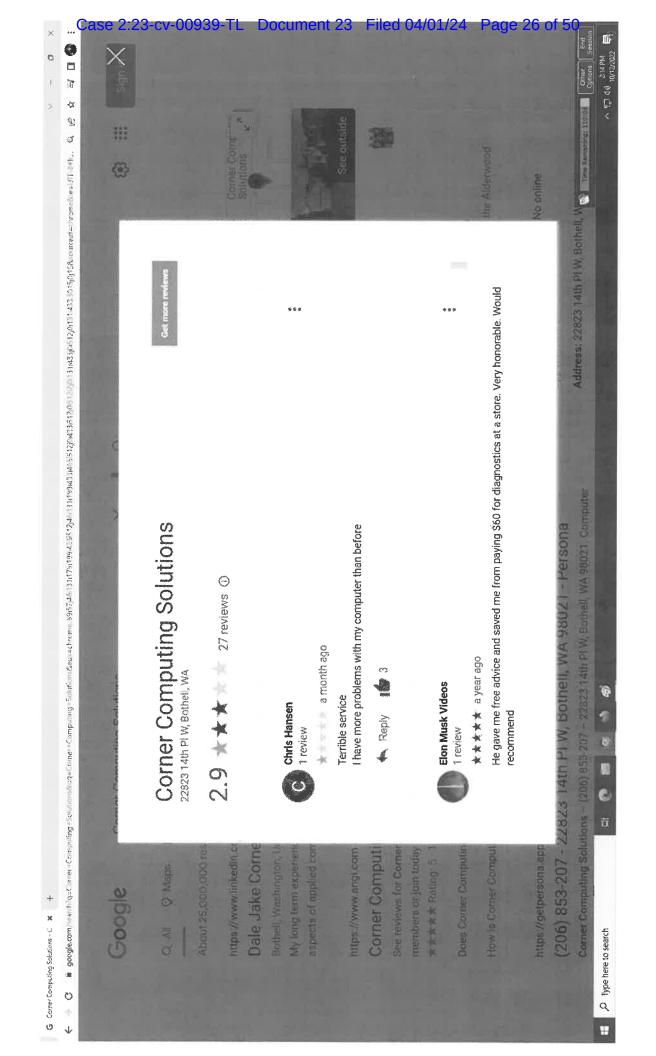


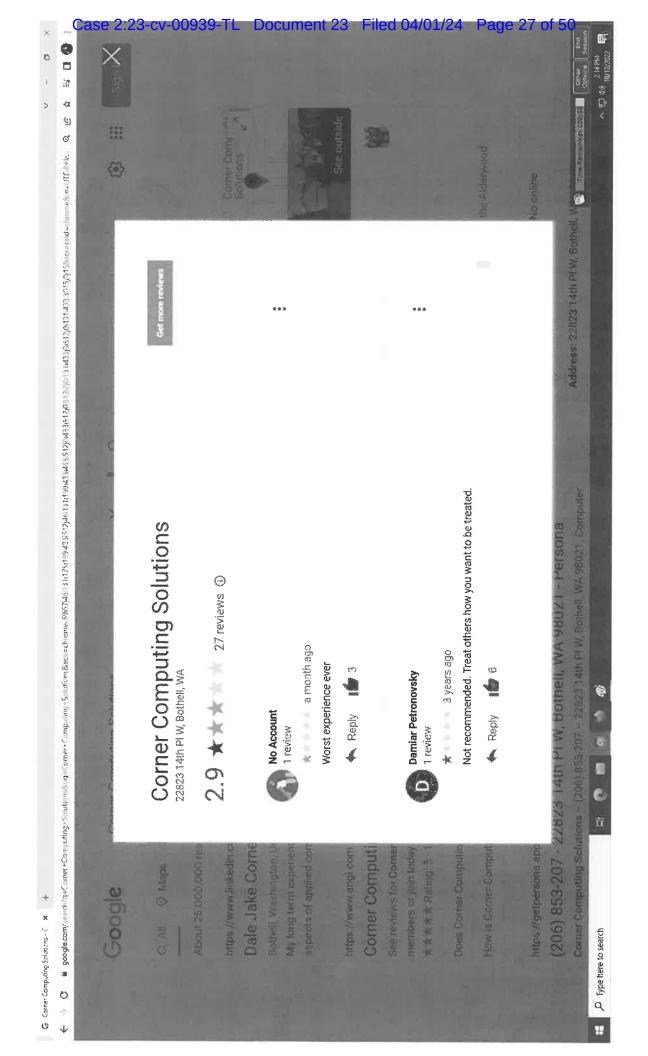


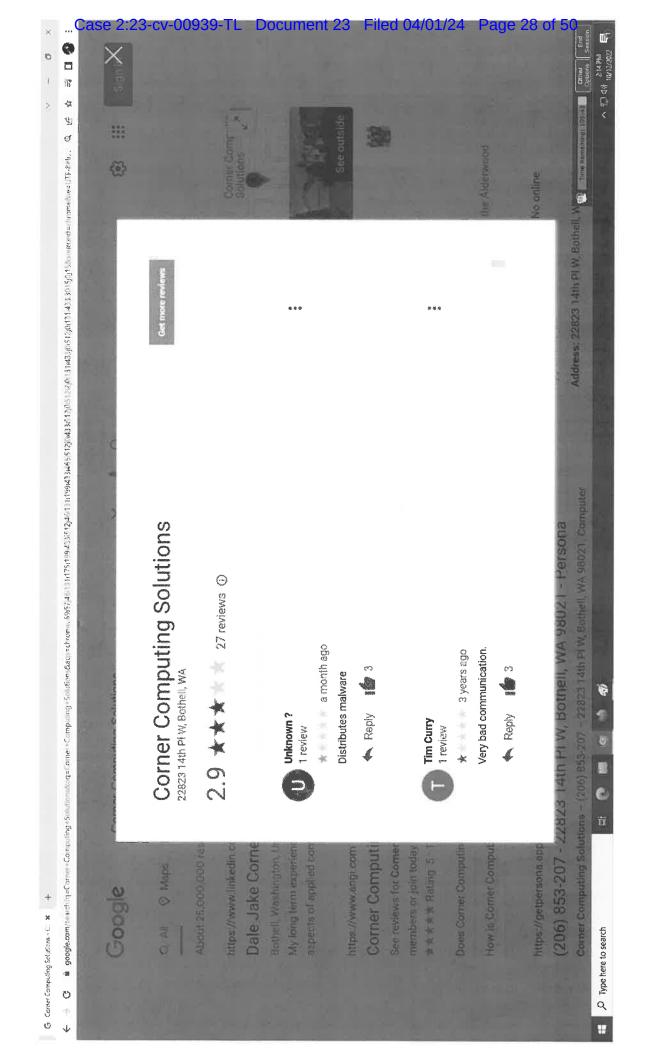


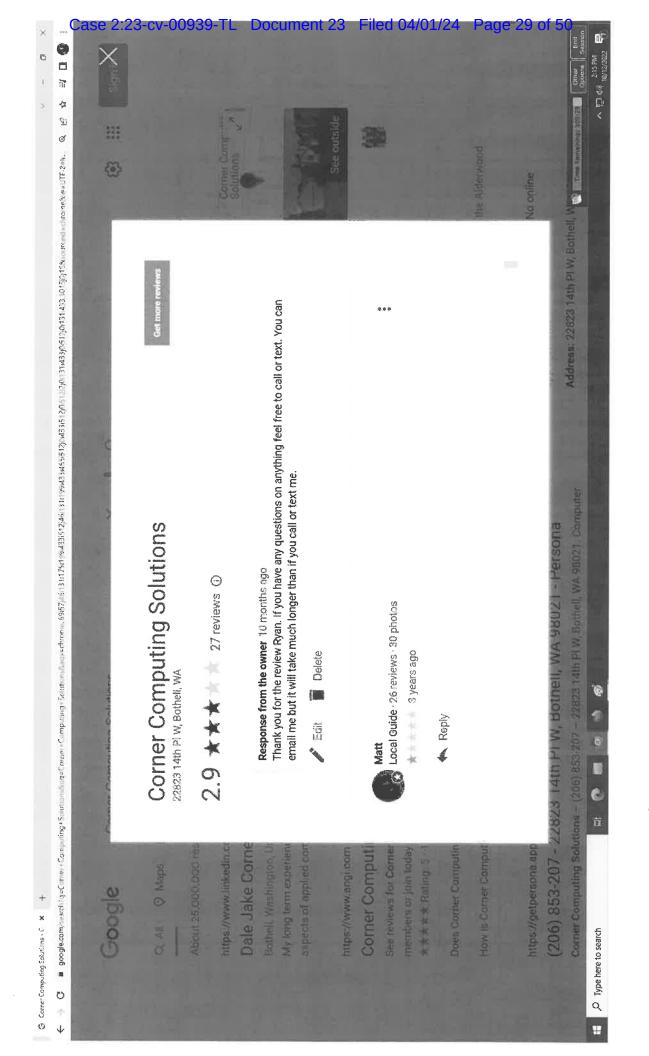


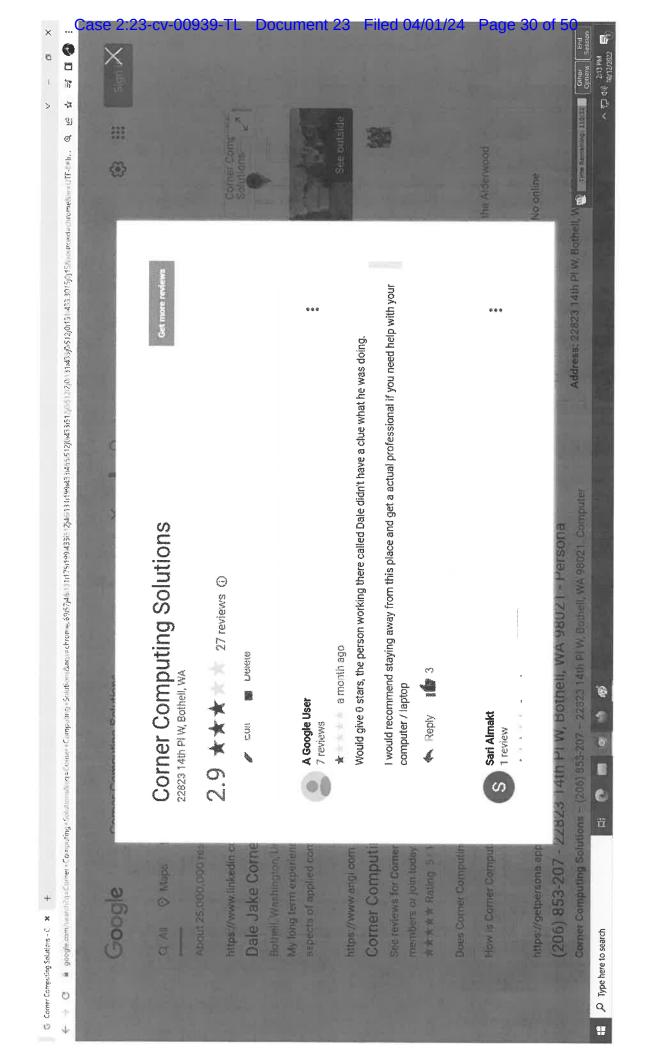


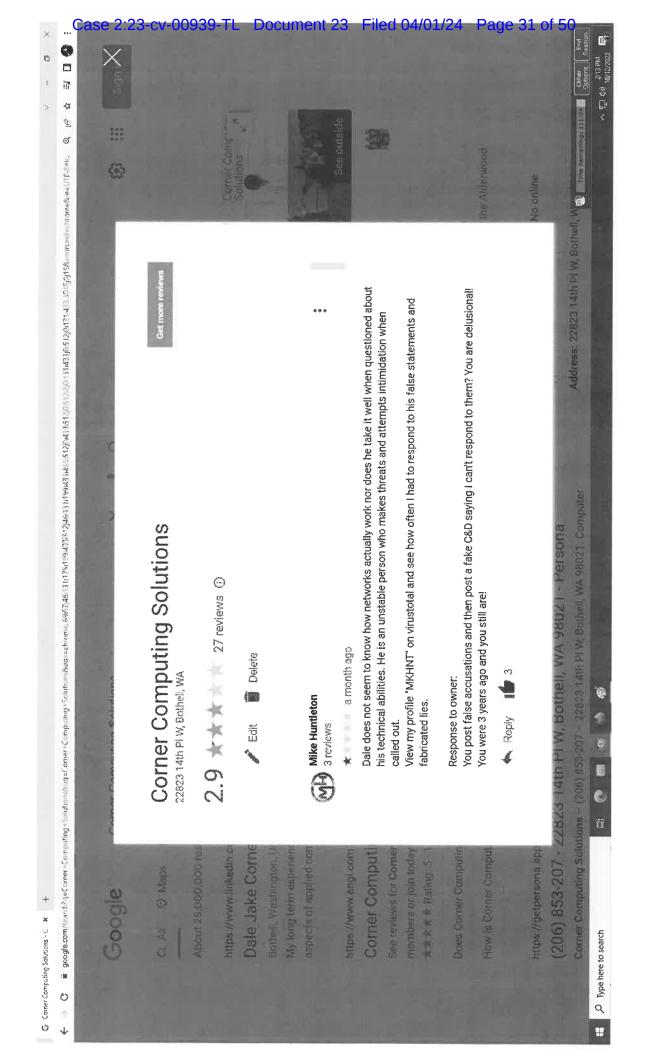


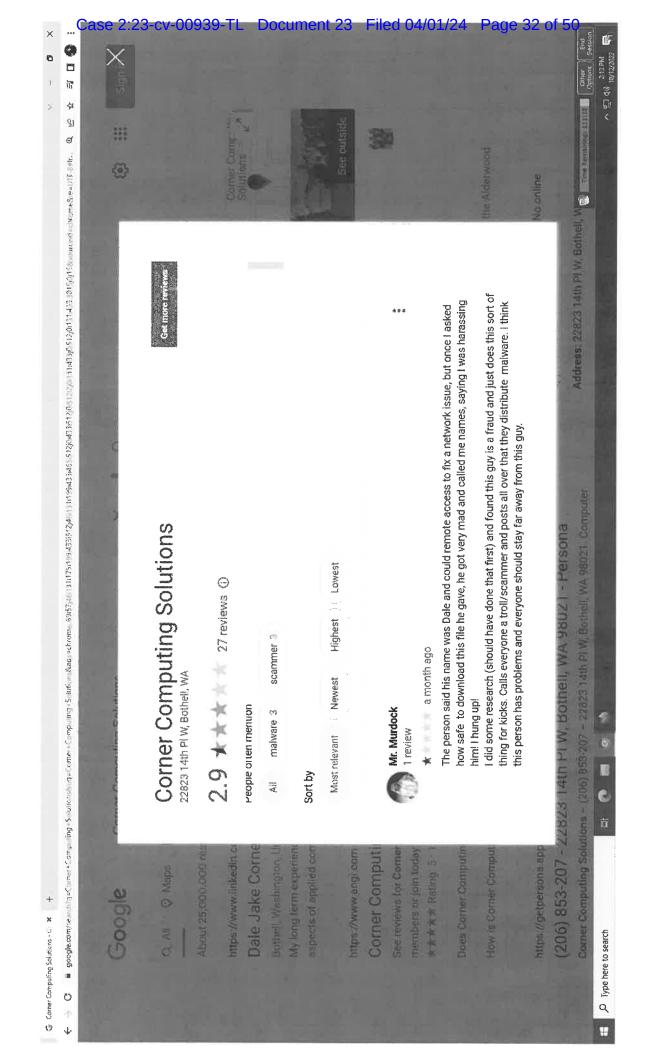


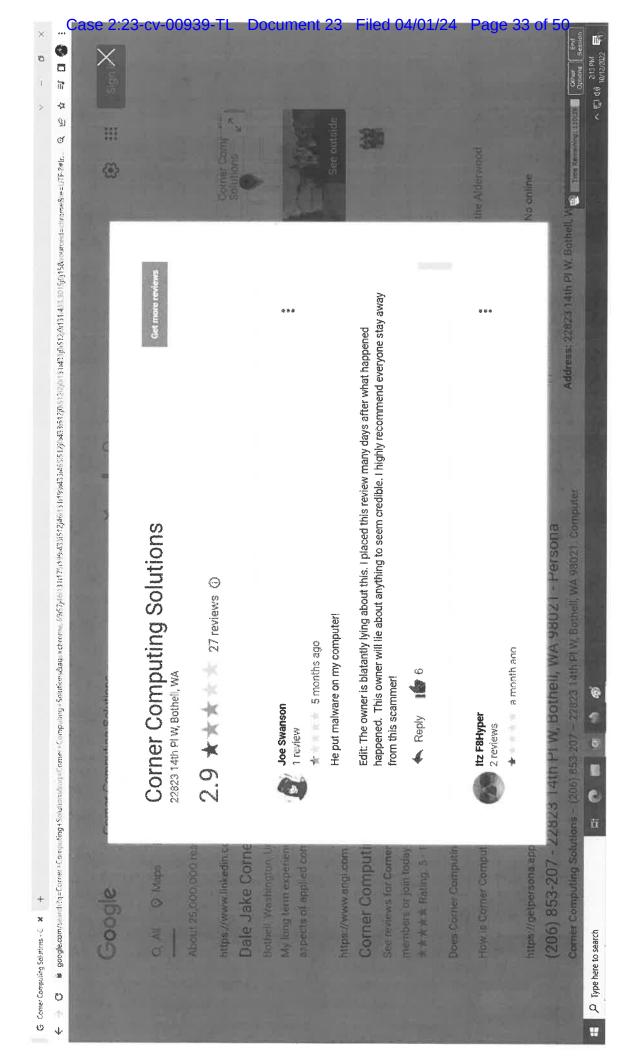


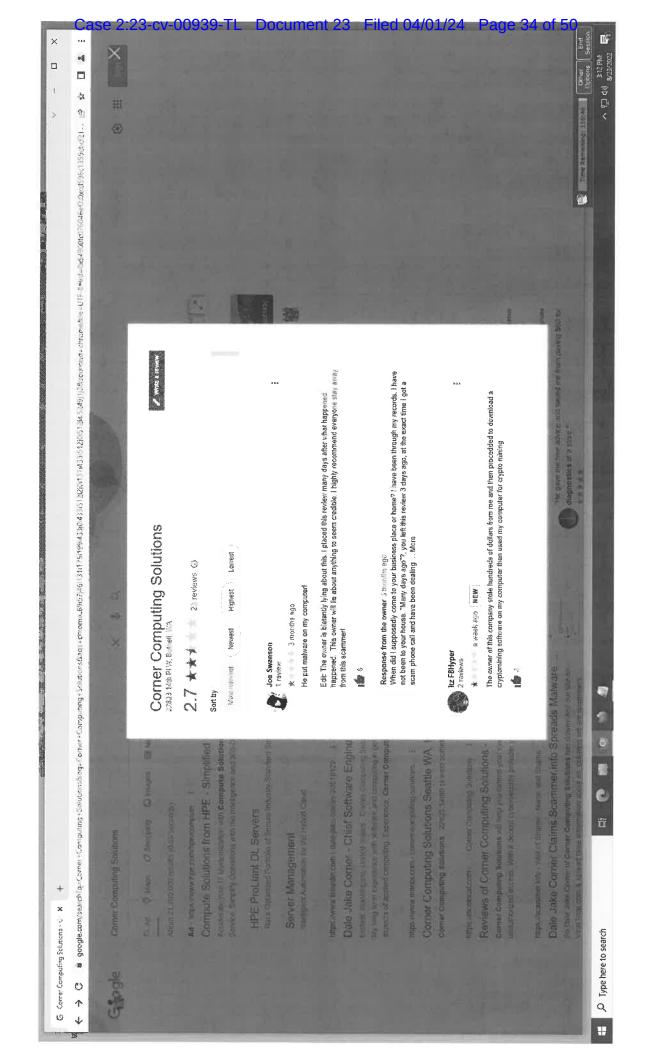












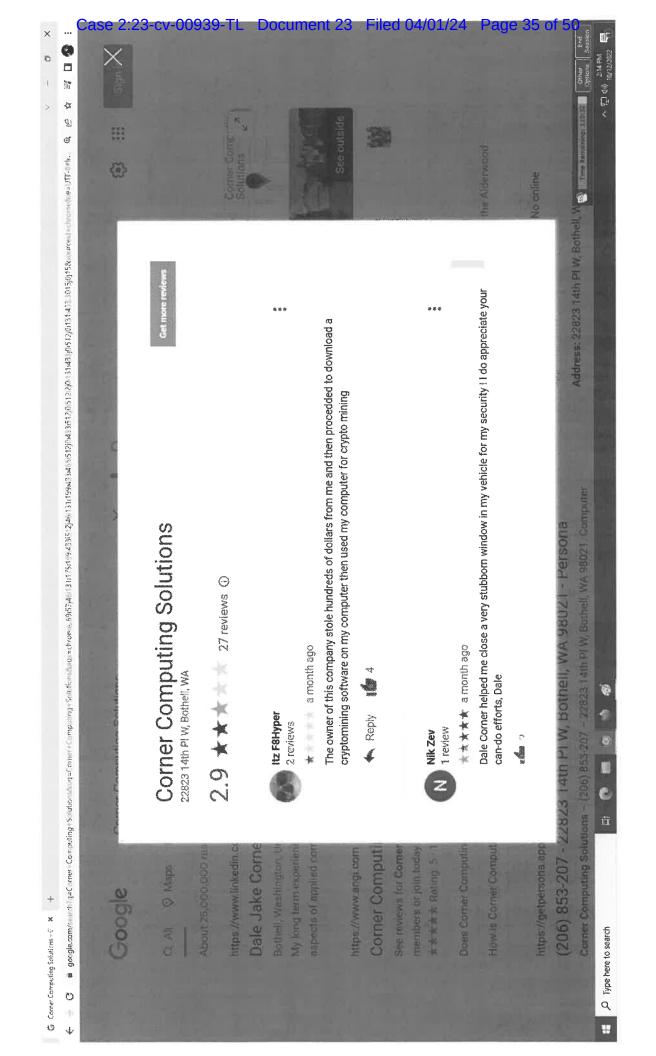
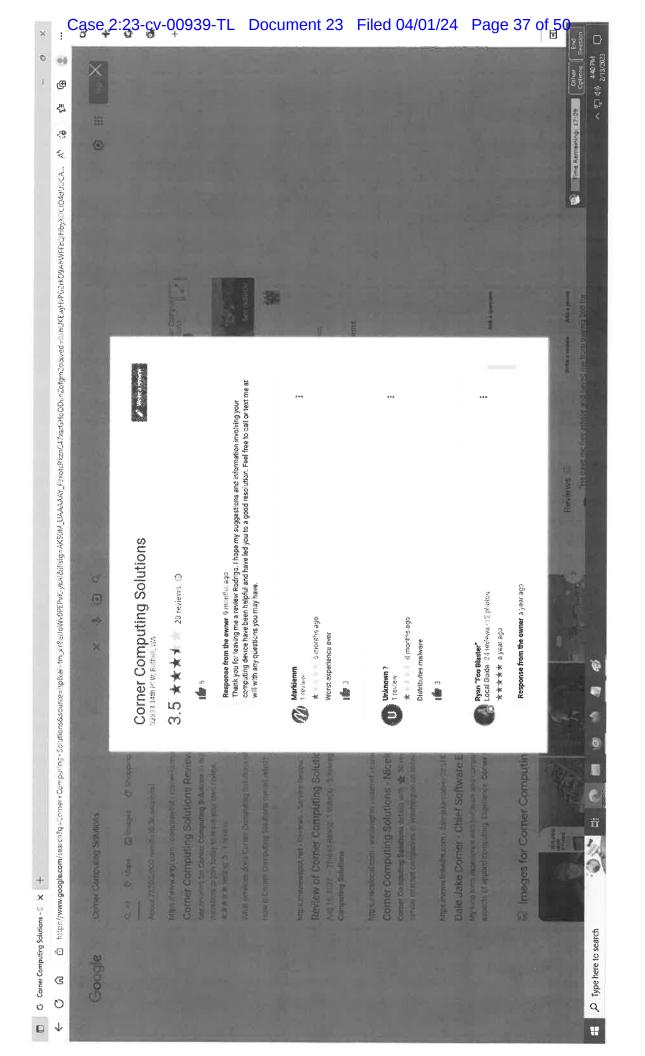
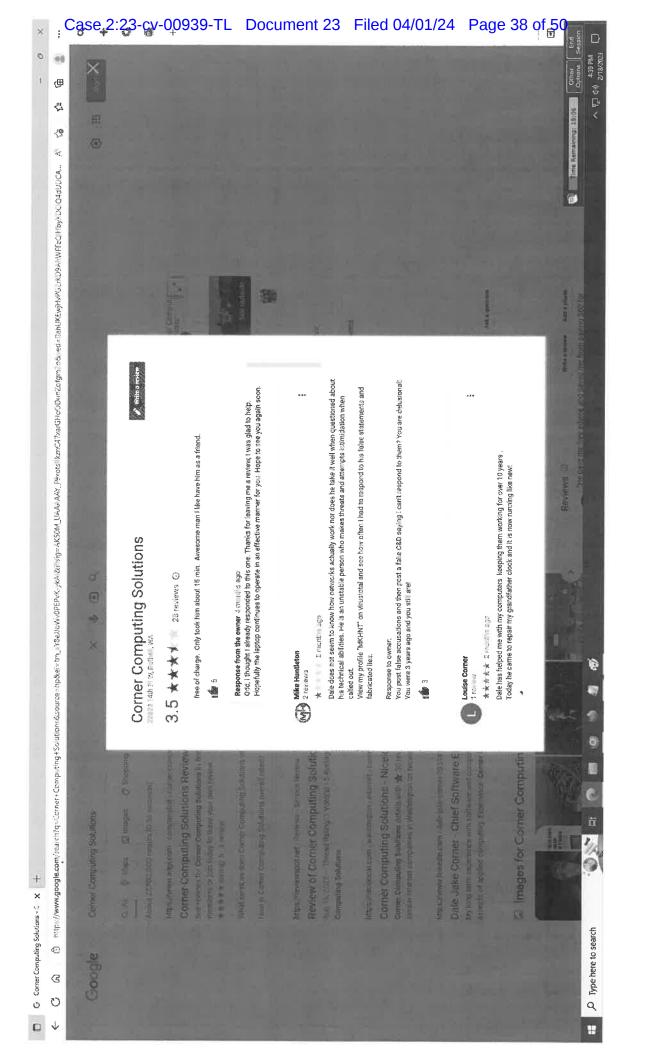
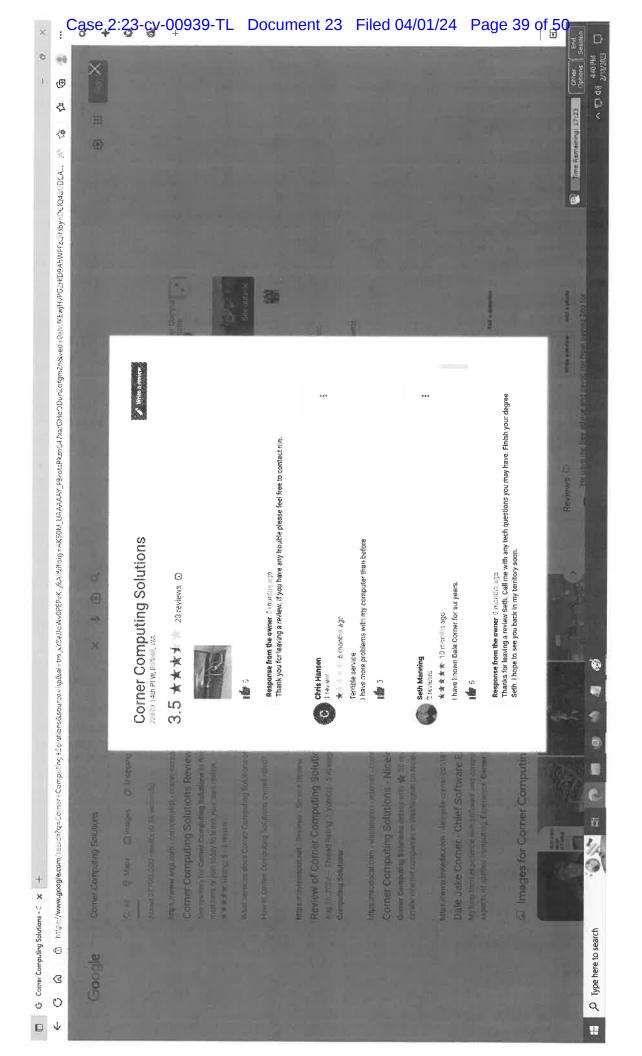


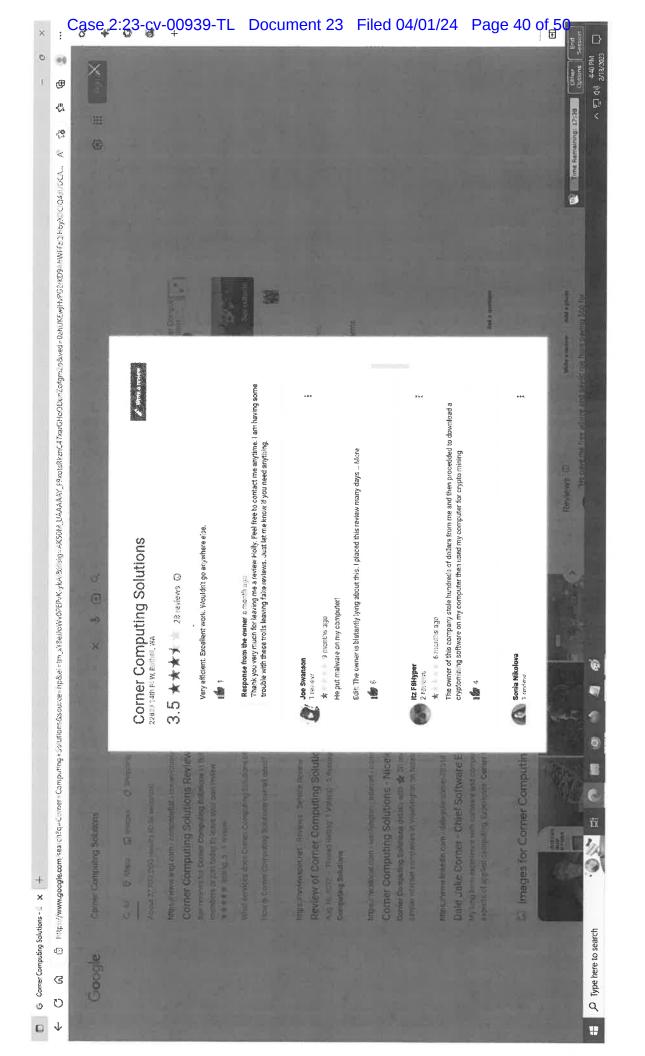
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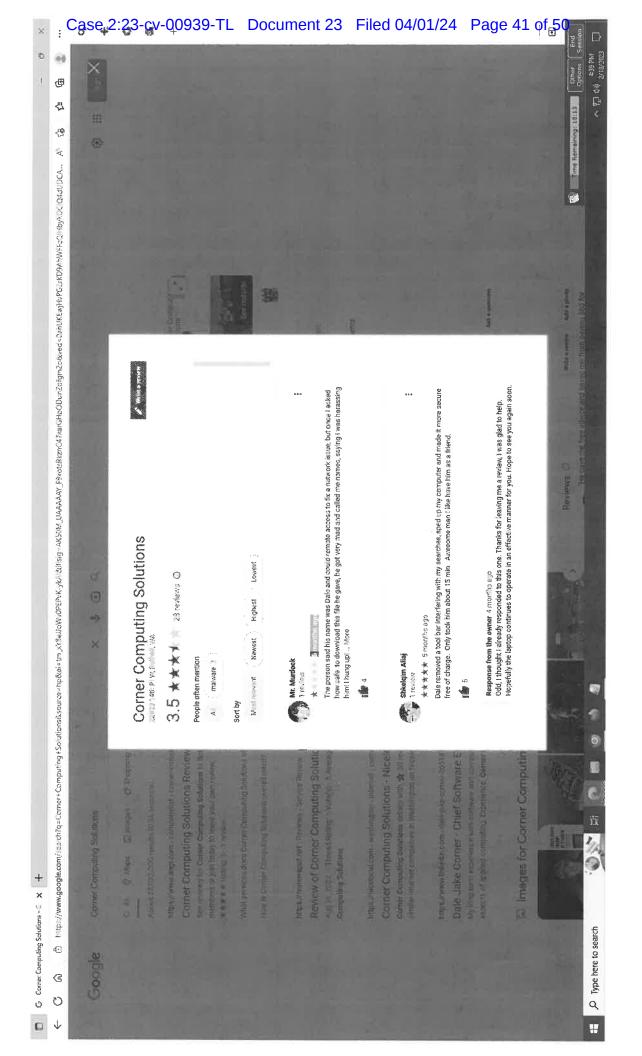


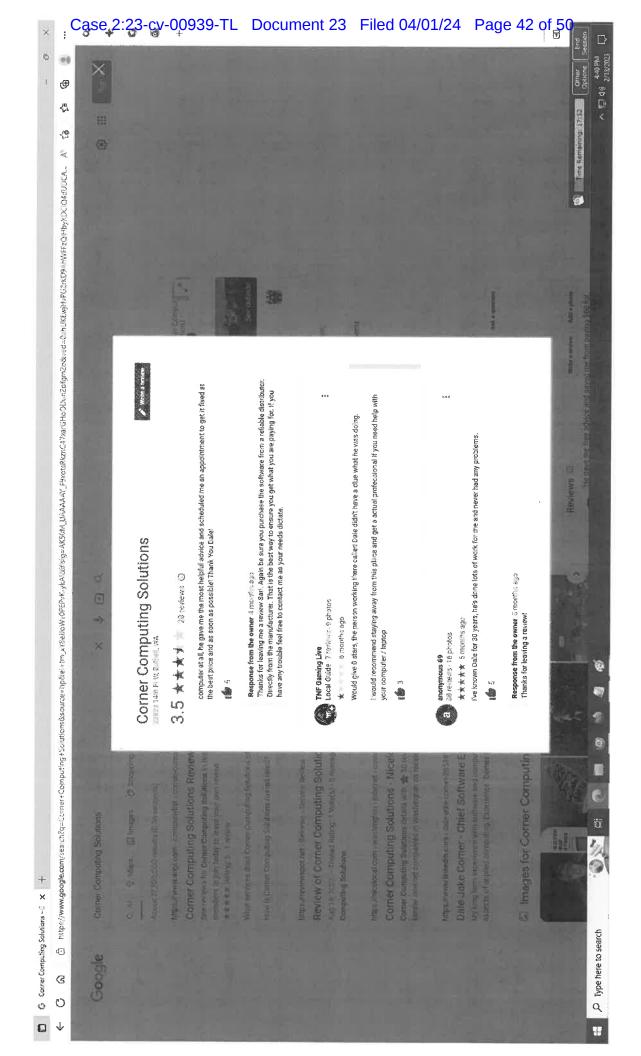












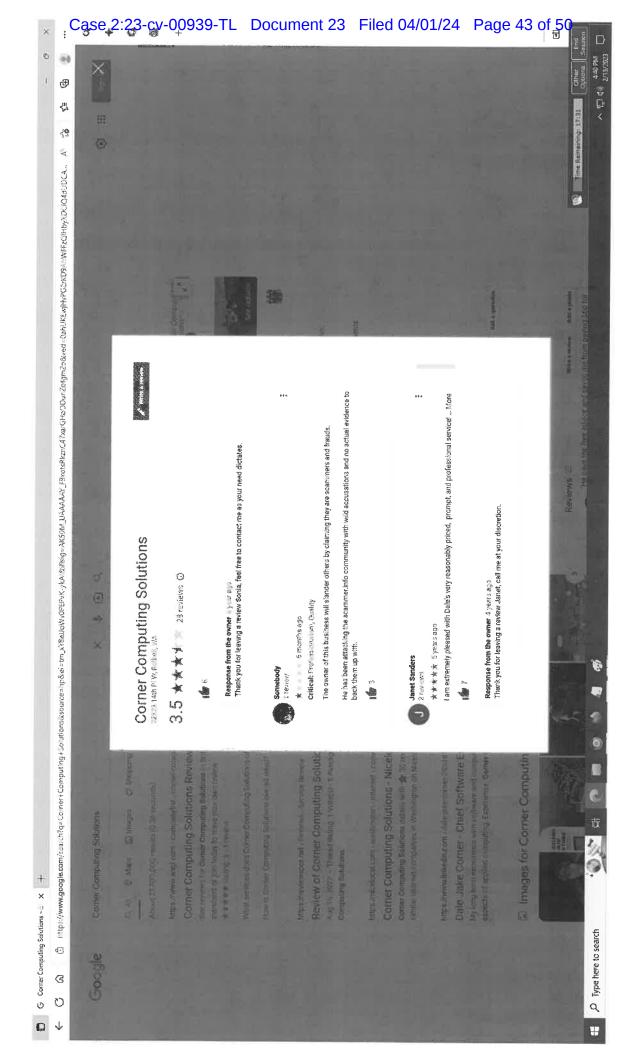


EXHIBIT C

